

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No. 1:14 CV 11858-NMG

TELEXFREE, INC.,

TELEXFREE LLC,

JAMES M. MERRILL,

CARLOS N. WANZELER,

STEVEN M. LABRIOLA,

JOSEPH H. CRAFT,

SANDERLEY RODRIGUES DE VASCONCELOS,

SANTIAGO DE LA ROSA,

RANDY N. CROSBY and

FAITH R. SLOAN,

Defendants,

and

TELEXFREE FINANCIAL, INC.,

TELEXELECTRIC, LLC and

TELEX MOBILE HOLDINGS, INC.,

Relief Defendants.

**PLAINTIFF’S ASSENTED-TO MOTION TO MODIFY PRELIMINARY INJUNCTION
ORDER, ORDER FREEZING ASSETS AND ORDER TO AS TO OTHER
EQUITABLE RELIEF AS TO DEFENDANT SANDERLEY RODRIGUES DE
VASCONCELOS AND REQUIRING A FURTHER ACCOUNTING**

The Securities and Exchange Commission (“Commission”) hereby moves, and defendant Sanderly Rodrigues de Vasconcelos (“Rodrigues”) hereby assents that this Court enter an order with two parts: (1) requiring that Rodrigues provide an accounting as specified in the attached order; and (2) modify the Preliminary Injunction Order Freezing Assets and Order as to Other Equitable Relief as to Defendant Sanderley Rodrigues de Vasconcelos (“Preliminary Injunction Order”) (ECF: 89) so that Rodrigues may withdraw \$200,000 to be used as bail in an

unrelated federal criminal case.

WHEREFORE, the Commission respectfully requests that this Court enter the proposed Order to o Provide Accountings and Carve-Out as to Sanderley Rodrigues De Vasconcelos

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

By its attorneys

/s/ Deena R. Bernstein

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Dated: June 10, 2015.

Certificate of Service

I, Deena Bernstein, certify that on June 10, 2015, the foregoing motion was filed electronically with the Court. Notice will be sent by e-mail to counsel of record for the defendants through the Court's electronic filing system, and the filings may be accessed through the Court's system.

Deena R. Bernstein

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